

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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ALPHA CEPHEUS, LLC
FIRST UNITED HEALTH, LLC,
CONSTELLATION HEALTH, LLC
NAYA CONSTELLATION HEALTH, LLC and
CONSTELLATION HEALTH INVESTMENT,
LLC,

Plaintiffs,

Docket No.: 18-cv-14322

-against-

CHINH CHU,
TRUC TO,
DOUGLAS NEWTON,
JAMES STEPIEN,
VICTOR CARDONA, and
JOHN DOE 1-10,

Defendants.

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PLEASE TAKE NOTICE, that upon the annexed Declaration of Timothy C. Parlatore, and the associated Memorandum of Law, the Plaintiffs shall move the Court, at a time and date to be set by the Court, for an order:

1. Pursuant to Fed.R.Civ.P. 65, Preliminarily and permanently enjoining Defendants, their partners, agents, employees, and all persons in active concert or participating with Defendants to stay away from the managers, shareholders, and associates of Plaintiffs. This includes Paul Parmar, Salil Sharma, Kiran Sharma, their minor children, and Elena Sartison (the

- “protected persons”), refrain from assault, stalking, harassment, menacing, reckless endangerment, disorderly conduct, intimidation, threats, or any criminal offense against the protected persons.
2. Pursuant to Fed.R.Civ.P. 26(d)(1), permitting expedited discovery on the limited issue of identification of additional parties involved in the stalking, threatening and harassing of the manager and shareholders of Plaintiffs, as well as the unlawful access of Plaintiff’s stored electronic communications. This includes, but is not limited to, issuing subpoenas, interrogatories and expedited, limited party depositions of the Defendants.
 3. Pursuant to L.Civ.R. 7.1(i), reconsidering the Court’s denial of Plaintiffs’ earlier application for similar relief; and
 4. Such other and further relief as the Court deems appropriate.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Timothy C. Parlatore', with a stylized, flowing script.

Timothy C. Parlatore, Esq.
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